

December 4, 2020

**Via ECF**

The Honorable Barbara Moses  
 Daniel Patrick Moynihan Courthouse  
 500 Pearl Street, Courtroom 20A  
 New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM Inc. Securities Litigation*, Master File  
 No. 1:17-cv-00916-RA-BCM

Dear Judge Moses:

Plaintiffs 683 Capital Partners, LP, Shipco Transport Inc., Sergey Regukh, Brian Armstrong, and E-Global Trade and Finance Group, Inc., and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout submit this joint letter motion proposing to modify the operative scheduling order.

Judge Abrams entered the original Case Management Plan and Scheduling Order on June 4, 2019 (“Scheduling Order”). ECF No. 142. On October 7, 2020, following the Parties’ unsuccessful mediation, the Parties submitted a joint letter motion proposing modifications to the Scheduling Order (the “First Amended Scheduling Order”). ECF No. 208. The Court granted the motion on October 15, 2020. ECF No. 210. The Parties have not sought any other extensions or modifications of the Scheduling Order.

The Parties now propose the following modifications to the First Amended Scheduling Order:

<b>Event</b>	<b>Deadline in First Amended Scheduling Order</b>	<b>Proposed Deadline</b>
Fact depositions completed	January 29, 2021	February 12, 2021
Close of fact discovery and responses to interrogatories and requests for admission	February 12, 2021	February 18, 2021

The Parties respectfully request that the Court enter the proposed schedule to allow sufficient time to complete fact depositions and written discovery responses prior to the close of fact discovery. Good cause exists to modify the First Amended Scheduling Order as proposed above. While the Parties have worked diligently to schedule or complete the depositions of seven fact witnesses and two Rule 30(b)(6) witnesses in November and December 2020, the Parties have also agreed to conduct seven additional depositions in 2021. Accordingly, the Parties request an additional two weeks to complete these depositions in advance of the close of fact discovery. The Parties also request a six-day extension of (1) the deadline for responses to interrogatories and requests for admission and (2) the close of all fact discovery to allow the Parties to incorporate any deposition testimony into their written discovery responses before the fact discovery period closes.

For these reasons, the Parties respectfully request that the Court enter a revised scheduling order as set forth above.

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

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